

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

TINA M. HILL,)
)
Plaintiff,)
)
v.) Cause No. 3:17-CV-1051
)
H.G. WEBER & COMPANY, INC.,) JURY TRIAL DEMANDED
)
Defendant.)

NOTICE OF REMOVAL

COMES NOW Defendant H.G. Weber & Company, Inc., by and through counsel, and pursuant to 28 U.S.C. §1446, respectfully represents to the Court as follows for its Notice of Removal:

1. Defendant H.G. Weber & Company, Inc., is a Wisconsin corporation with its principal place of business at 725 Fremont Street, Kiel, Wisconsin 53042. *See Exhibit 1, Affidavit of Jason Hassel.*
2. Plaintiff is a citizen and resident of Madison County, State of Illinois. *See Exhibit 2, Plaintiff's Complaint ¶3.*
3. Defendant H.G. Weber & Company, Inc., at the time of filing this Notice, as well as at the time of the filing of this case and at the time it became removable, and at all times mentioned herein, is and was a citizen and resident of the State of Wisconsin. *See Ex. 1, Hassel's Affidavit.* Plaintiff is a citizen and resident of the State of Illinois, and therefore diversity of citizenship exists between Plaintiff and Defendant. *See Ex. 2, Plaintiff's Complaint.*
4. Plaintiff has filed suit in the Circuit Court of the 3rd Judicial District, Madison County, State of Illinois, Cause No. 17-L-1161 against Defendant H.G. Weber & Company,

Inc. *See Ex. 2, Plaintiff's Complaint.*

5. Plaintiff prays for actual damages as determined at trial, plus post-judgment interest and costs of suit, all of which are in excess of \$50,000. This Defendant has a good faith reason to believe Plaintiff is seeking more than \$75,000 as it is an action for personal injuries and lost income based on significant injuries including her hair and scalp being ripped from her skull. Therefore, the jurisdictional amount for removal is met.

6. Defendant H.G. Weber & Company, Inc. was served with Plaintiff's Complaint on or about September 5, 2017, which is not more than 30 days prior to the filing of this Notice of Removal pursuant to 28 U.S.C. §1446(b). *See Exhibit 2.*

7. Defendant's counsel is licensed to practice law in the State of Illinois and the United States District Court for the Southern District of Illinois.

8. Defendant hereby requests a trial by jury on all claims.

9. Counsel for Defendant herewith attaches all pleadings filed in Case No. 17-L-1161, pursuant to 28 U.S.C. §1446(a).

WHEREFORE, Defendant H.G. Weber & Company, Inc. herewith removes the above-described case, Cause No. 17-L-1161, of the Circuit Court of the 3rd Judicial Circuit of Madison County, State of Illinois, *Tina M. Hill v. H.G. Weber & Company, Inc.*, to this Court for further proceedings.

**RYNEARSON, SUESS, SCHNURBUSCH
& CHAMPION, LLC**

By /s/ Heather J. Hays
Jeffrey K. Suess #6197165
Heather J. Hays #6269921
Attorneys for Defendant
500 N. Broadway, Ste. 1550
St. Louis, MO 63102
(314) 421-4430
(314) 421-4431 (FAX)
jsuess@rssclaw.com
hhays@rssclaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 28th day of September 2017, a true and correct copy of the foregoing document was mailed by First Class Mail, postage prepaid, and sent by the Court's electronic filing system to: Richard J. Zalasky/Ashley E. Vaughan, Brown & Crouppen, P.C., 211 N. Broadway, Ste. 1600, St. Louis, MO 63102.

/s/ Heather J. Hays